

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 2419  
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S NOTICE OF  
FILING REVISED PROPOSED QUALIFIED PROTECTIVE ORDER CONCERNING  
PRODUCTION OF CERTAIN INFORMATION MAINTAINED BY GOVERNMENTAL  
PAYERS/PROVIDERS**

On July 21, 2016, the Plaintiffs' Steering Committee ("PSC") moved for entry of a Qualified Protective Order Concerning the production and exchange of certain information maintained by state Medicaid agencies [Dkt. No. 2999]. Since that filing, the PSC has been in communication with counsel for certain clinic Defendants to agree on revisions to the proposed order that would avoid potential objections to the order by clinic Defendants.

The attached revised proposed order provides that the PSC will give notice to clinic Defendants as to the nature of the information produced by state Medicaid agencies to the Tort Trustee and to Lead Counsel for purposes of resolving liens in the NECC Bankruptcy Settlement. The proposed order provides that if, after receiving notice of the nature of the information produced by the Medicaid agencies, clinic Defendants believe they are entitled to receive that information, the parties will have an opportunity to brief the issues to the Court for determination.

As the changes made to the proposed attached Qualified Protective Order are agreed upon, and the PSC and the Tort Trustee believe that such a Qualified Protective Order is imperative to obtain the necessary data from state Medicaid agencies and to facilitate the

payment of claims to victims from the Tort Trust, the PSC respectfully requests that the Court enter the proposed order attached hereto as Exhibit A as soon as possible.

Dated: July 27, 2016

Respectfully submitted,

**/s/ Kristen A. Johnson**

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*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, Kristen A. Johnson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: July 27, 2016

**/s/ Kristen A. Johnson**  
Kristen A. Johnson, BBO # 667261